

CIVIL NO. 3:24-CV-01002-MOC-SCR

Plaintiff,

DAEJHANAE JACKSON,)
ALYSSE HYATT, MALIK DYER,)
WENTER DONOVAN,)
KHALIL COOKE,)
NAZEER TYREE WIGGINS,)
UNITED STATES DEPARTMENT)
OF STATE, AND THE)
FEDERAL BUREAU OF)
INVESTIGATION,)

Defendants.

**FEDERAL DEFENDANTS UNITED STATES DEPARTMENT OF STATE AND
FEDERAL BUREAU OF INVESTIGATION'S MOTION TO DISMISS**

COMES NOW the United States of America, on behalf of the Federal Bureau of Investigation (“FBI”) and United States Department of State (“State Department”), hereinafter “Federal Defendants,” by and through Russ Ferguson, United States Attorney for the Western District of North Carolina, and moves to extend the time for filing the Reply Brief in Support of the FBI’s and State Department’s Motion to Dismiss for 14 days from March 17, 2025 to March 31, 2025. In support of this extension, the Federal Defendants will need to review the Plaintiffs’ Response Brief (Doc. 38, 39), draft the Reply Brief, and coordinate the Reply Brief with and within

both the FBI and State Department. The undersigned has additional case and supervisory responsibilities. The undersigned has reached out to opposing counsel who does not object to the relief requested.

WHEREFORE, the Federal Defendants request that the time to reply to Plaintiff's Response to the Federal Defendants' Motion to Dismiss be set for March 31, 2025.

This the 12th day of March, 2025.

Respectfully submitted,

RUSS FERGUSON
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s/GILL P. BECK
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